

TECHNICAL PROGRESS REPORT EPA Contract No. EP-C-15-022

Work Assignment No. 4-96

Support for Region 8 Underground Injection Control Dewey-Burdock Permitting Actions

December 1 – December 28, 2019

Work Assignment COR: Cadmus Project Leader:

Effective Date: Completion Date:

Bruce Suchomel
Mary Ellen Tuccillo

July 1, 2019 June 30, 2020

Summary of Activities for Current Month:

Task 0: Work Plan, QA Documents, and Monthly Progress Reports

- Cadmus performed routine work assignment management tasks including preparing the monthly progress report, coordinating with the WACOR, processing travel paperwork as needed, and tracking budget expenditures.
- Cadmus submitted to EPA the work plan and budget for Amendment 2 on December 13, 2019.
- On December 19, 2019, Cadmus held a kickoff call with EPA to discuss work to be done under the new Task 4 and ongoing work and related questions under Task 3.

Task 1: Conceptual Site Model and Groundwater Geochemical Model

None.

Task 2: Administrative Support with Tribal Consultation Tasks

None.

Task 3: Development of the Response-to-Comments Document for the Region 8 UIC Permitting Actions at the Dewey-Burdock Uranium In-Situ Recovery Site

- Cadmus continued to develop summaries on the public comment topics.
- Cadmus began to develop draft responses to comments based on text in the supporting documents (e.g., permits, fact sheets, EJ report) for developing responses to public comments, and draft example responses.

- Cadmus provided a list of line edits to the permits and AE ROD suggested by commenters on December 4, 2019.
- On December 26, 2019, Cadmus sent to EPA the Crow Butte comments encountered in the public comments.

Task 4: Organize Public Comments Received during the 2019 Public Comment Period and Public Hearing and Update the Response to Comments Document with the 2019 Comments and Any New Comment Categories or Sub-Topics as Applicable

 Cadmus began categorizing public comments (electronic submissions, the transcript of verbal comments, and copies of handwritten comments) and adding them to the comments summarization table initially developed under WA 94 for the first set of public comments (not being responded to in Task 3).

Quality Assurance Activities and Issues:





Programmatic Requirement:

Secondary Data: Cadmus will develop products based on the best available information sources, or on such sources as directed to use by the WACOR.

In beginning to develop public comment summaries and responses, Cadmus has used the information sources provided by EPA for this purpose, including permit fact sheets, environmental justice analyses, and other documents related to the Dewey-Burdock project site. Cadmus will use the most recent versions of those documents as provided by EPA to ensure that current information is incorporated into responses.

Technical Documents: Cadmus will develop guidance and other technical documents that communicate engineering, scientific, and related concepts clearly and accurately, and that are appropriately phrased for the target audience.

- In developing public comment summaries, Cadmus will ensure that the summaries
 accurately represent and synthesize the transcripts and written comments made by the
 public regarding the Dewey-Burdock project.
- In developing comment responses, Cadmus will ensure that content from the permits, fact sheets, and other documents is represented accurately in the response to comment document.

Cost Control Requirement:

The Cadmus Project Manager will monitor project status and will provide monthly progress reports indicating the level of budget utilized and estimating the budget needs for the upcoming reporting period. Cadmus will identify the QA measures undertaken in each reporting period through the monthly progress reports. Cadmus will maintain close communication with the WACOR regarding project and budget status and will notify the WACOR immediately in cases where issues impacting project cost are identified. As needed, Cadmus will work with the WACOR to develop a risk management strategy to identify and address any specific project element(s) that adversely impact the proposed work plan. This strategy will identify the risks associated with failure to resolve the issue(s). Cadmus will work with the WACOR to assess and prioritize any remaining tasks and develop an analysis of alternative solutions.

 The Cadmus Project Manager reviewed the status of the funds. No concerns were identified.

Schedule Requirement:

Cadmus will provide services and submit deliverables in accordance with approved work assignment milestones and deliverable schedules. The Cadmus Project Manager will notify the WACOR immediately if, at any time, it determines that the schedule will not be met for any reason.

Please see Project Schedule/Milestones for planned and actual completion dates.

Document Development Requirement:

Cadmus will provide documents that are technically and factually accurate and suited to the intended audience.

Not applicable in this reporting period; no products due.

Problems Encountered and Risk Management Strategies Implemented:

None.

Anticipated Activities for Next Reporting Period:

Task 0: Work Plan, QA Documents, and Monthly Progress Reports

 Cadmus will perform routine work assignment management tasks including preparing the monthly progress report, coordinating with the WACOR, processing travel paperwork as needed, and tracking budget expenditures.

Task 1: Conceptual Site Model and Groundwater Geochemical Model

None.

Task 2: Administrative Support with Tribal Consultation Tasks

None.

Task 3: Development of the Response-to-Comments Document for the Region 8 UIC Permitting Actions at the Dewey-Burdock Uranium In-Situ Recovery Site

 Cadmus will continue developing responses to public comments using the most current versions of permits, fact sheets, and other documents and incorporating any EPA feedback on the example responses to comments provided by EPA regarding aquifer exemptions regarding tone and level of detail.

Task 4: Organize Public Comments Received during the 2019 Public Comment Period and Public Hearing and Update the Response to Comments Document with the 2019 Comments and Any New Comment Categories or Sub-Topics as Applicable

- Cadmus will continue categorizing the new comments.
- Cadmus will also begin evaluating the need for updates to comment topic summaries and response text being developed for Task 3 in order to reflect the new 2019 public comments.

Problems Encountered and Risk Management Strategies Implemented:

None.

Project Schedule/Milestones:

	Tasks	Planned Completion Date	Actual Completion Date
<u>No.</u>	0: Work Plan, OA Documents, and N	Ionthly Progress Reports	·
1 ask		According to contract.	July 19, 2019
0.1	Work plan and budget.	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	Revised work plan and budget.		
	Monthly progress and financial	Monthly.	
0.2	reports.	135.34	
Task	1: Conceptual Site Model and Grou	ndwater Geochemical Model	
	Conference call/web conference to discuss progress.	Approximately 5 business days after start of WA.	Completed
1.1	Annotated bibliography for the conceptual site model in searchable Adobe Acrobat format.	20 business days after approval of SPQAPP.	Completed

No.	Tasks	Planned Completion Date	Actual Completion Date
1.2	The criteria document for the conceptual site model in word-searchable Adobe Acrobat format from which text may be copied and pasted.	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.	September 17, 2019
1.3	Background document for the conceptual site model criteria in word-searchable Adobe Acrobat format and Microsoft Word format.	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.	September 17, 2019
	Final versions of deliverables 1.1, 1.2 and 1.3 addressing comments from the EPA.	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.	
	Conference call/web conference to discuss progress.	Approximately business 40 days after approval of SPQAPP.	Completed.
1.4	Annotated bibliography for the groundwater geochemical model in searchable Adobe Acrobat format.	45 business days after approval of SPQAPP.	Completed.
1.5	The criteria document for the groundwater geochemical model in word-searchable Adobe Acrobat format from which text may be copied and pasted.	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.	September 17, 2019
1.6	Background document for the groundwater geochemical model criteria in word-searchable Adobe Acrobat format and Microsoft Word format.	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.	September 17, 2019
1.7	Acceptance criteria document for the groundwater geochemical model in word-searchable Adobe Acrobat format and Microsoft Word format,	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.	September 17, 2019
	Final versions of deliverables 1.4, 1.5, 1.6 and 1.7 addressing comments from the EPA.	Within 20 business days after receiving comments from the EPA on Subtask 1.6 and 1.7 documents.	Final for Task 1.4 completed under WA 3-96. Final versions of deliverables for Tasks 1.5, 1.6, and 1.7 submitted on September 17, 2019.

		Planned Completion Date	Actual Completion Date
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ask 2	: Administrative Support with Triba	Consultation rasks	
•	ine man unan contact	Within 3 business days after receiving the tribal mailing list from the EPA.	Completed.
2	A MS Word file of the tribal consultation letters ready for the EPA to print and route for signature.	Within 3 business days after finalizing the tribal contact list.	June 6, 2019
2.3	Email pdf files of the signed consultation letters and attachments (received from the EPA) to each tribal leader, courtesy copy the tribal environmental director and THPO and save each email as a pdf file.	Within 3 business days of receiving the pdf files of the signed consultation letters from the EPA.	July 25, 2019
2.4	Forward all emails from tribes to the EPA, save the emails as pdf files and make the pdf files available to the EPA.	Forward emails to the EPA within 1 business day of receiving the email from a tribe.	Ongoing.
2.5	An ongoing list of communication with tribes including the information indicated in Subtask 2.5; make the list available to the EPA.	Update list within 1 business day of the communication event.	Ongoing.
2.6	A list of tribes and designated tribal contact for each tribe interested in scheduling consultation meetings with the EPA, updated as needed; make the list available to the EPA.		Ongoing.
2.7	Notification to the EPA of any questions or comments from a tribe the Contractor deems appropriate to refer to the EPA.	Within 1 business day of the referral.	Ongoing.
2.8	Continue to the ED	the tribe, it possible.	Ongoing-
2.	An MS Word file of the final consultation letters ready for the EPA to print and route for signature.	Within 3 business days after receiving the tribal mailing fi from the EPA.	st

No.	Tasks	Planned Completion Date	Actual Completion Date
2.10	Email pdf files of the signed final consultation letters and attachments (received from the EPA) to each tribal leader, copy the tribal environmental director and THPO and save each email as a pdf file.	Within 3 business days of receiving the pdf files of the scanned signed letters from the EPA.	
2.11	Follow-up calls to tribes after emailing the final consultation letter.	Begin calls after 5 business days of emailing the final consultation letter, completing the task within 10 business days of emailing the final consultation letter.	
Task Actio	3: Development of the Response-to- ons at the Dewey-Burdock Uranium	Comments Document for the Regi In-Situ Recovery Site	ion 8 UIC Permitting
3.1	An MS Word document containing introductions to comment topics with areas flagged for the EPA where the responses to some comments or comment concepts were not addressed by the information provided in the draft documents.	January 22, 2020	
3.2	Any QA documentation generated while tracking comments under the appropriate response section in the Response-to-Comments document, as applicable.	February 28, 2020	
	4: Organize Public Comments Receing and Update the Response to Comnient Categories or Sub-Topics as Ap		ent Period and Public omments and Any New
4.1	A document containing all public comments received, organized under comment topics in a format agreed upon by the Contractor in coordination with the EPA.	January 31, 2020	
1.2	An MS Word document containing updated introductions to comment topics, as applicable, and updated responses to comments using information available from the 2019 draft documents, as applicable, with areas flagged for the EPA where the responses to some comments or comment concepts were not addressed by the information provided in the draft documents.	February 28, 2020	

No.	Tacks	Planned Completion Date	Actual Completion Date
4.2		February 28, 2020	

Changes in Assigned Personnel:

None.

Estimated Amounts to Be Invoiced Next Month:

LOE hours	200
Dollars	\$27,000
17011013	

The Cadmus Group, Inc. Project Labor Summary

For the Period of: 12/1/2019 - 12/28/2019 EP-C-15-022

Labor Cate Project	gory	Period Actual	ITD Actual
5870.0004.0096		Hours	Hours
	ESSIONAL LEVEL		
002219	DURUSU, TANER A	A #	
002286	GOUT, ELISE C	0.0	7.2
002317	KORFMACHER, MATIAS S	23.3	31.3
002249	LAURENCE, GALEN G	0.3	1.3
002296	SUNG-CLARKE, SERENA W	0.0	14.9
002208	TAYLOR, ALEXANDER T	0.0	1.7
		28.9	59:7
	Total Hours P1	52.5	116.1
P2 PROFE	SSIONAL LEVEL		
002301	HALL, ALYSSA B	0.4	0.0
002209	RESS, ERIN L	0.0	0.9
001656	WALTERS, MARTHA A	0.1	1.9
	Total Hours P2		
***		0.5	4.0
	SSIONAL LEVEL		
001986	FERRARO, COURTNEY M	0.3	3.9
001240	SOMOR ANDREW J	0.0	0.5
	Total Hours P3	0.3	4.4
P4 PROFES	SSIONAL LEVEL		
000688	AGUIAR, SANDRA M	1.0	* ^
001137	BOYD, GLEN R	0.0	4.0
000888	COTE, DRUANNE P	0.0	8.2
000056	HERTZLER, PATRICIA C.	0.5	14.0
000511	LETKIEWICZ, FRANK	0.5	3.0
000107	RING, SHARI S.	88.5	2.7
000736	SKLENAR, KAREN S	0.0	194.0
000863	TUCCILLO, MARY ELLEN	12.5	11.5
	Total Hours P4		131.5
	ruta mours P4	103.0	368.9

Total Hours for 5870.0004.0096



493,4

156.3

Contract No.: EP-C-15-022; Year 4 The Cadmus Group, Inc.

For the Period of: 12/1/2019 - 12/28/2019

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WA 4-096

Summary of Claimed Current and Cumulative Costs and Fee Earned

# BALANCE REMAINING 104.0 21.6 195.1 195.1 196.6 56.722 0.0 3.823 0.0 5.090 5.	
WORK ASSIGNMENT BUDGET Hours 602.0 108.0 26.0 26.0 564.0 1150.0 116.330 124.533 124.533	
CUMULATIVE AMOUNT CLAIMED Hours 116.1 4.0 4.4 368.9 6.0 4.4 368.9 53.446 53.446 53.446 53.898 3.113	
CURRENT AMOUNT CLAIMED Hours 52.5 0.5 0.3 103.0 156.3 156.3 17.426 18.412	
Major Cost Elements* P1 P2 P3 P4 Total Direct Labor COMPUTER COST CENTER Total Amount** Total Amount**	Hourly Rate

** Because of rounding, figures may not add up precisely in some cases. Each major cost element includes all applicable indirect costs. 124,533 65,635 65,635 58,898 Cumulative Remaining Approved Amount: Cumulative Amount Suspended Cumulative Amount Disallowed Cumulative Amount Unbilled: Amount Originally Invoiced: Current Amount Unbilled:

124,533

Amount Obligated:

40,486

Funding % Remaining Funding \$ Remaining:

Funding:

Amount Paid.

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